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7 BEFORE THE INSURANCE COMMISSIONER
8 OF THE STATE OF WASHINGTON

9 In the Matter of the Application regarding the
10 Conversion and Acquisition of Control of
11 Premera Blue Cross and its Affiliates.

No. G 02-45

12 INTERVENORS' SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS

13 TO: Applicant, PREMERA and Premera Blue Cross and its Affiliates ("Premera")

14 AND TO: Robert Mitchell and Thomas Kelly of Preston Gates & Ellis LLP, their attorneys

15 The four Intervenor Groups (Premera Watch Coalition, the Hospital Associations, the
16 Washington State Medical Association, and the Alaska Intervenor Groups) have authorized the undersigned
17 counsel for Premera Watch Coalition to propound, on behalf of each of them and pursuant to the
18 previous Orders herein, the following Request for Production of Documents to Premera.

19 By agreement with Premera, the date for Premera's Response to the Request and for
20 inspection is no later than noon on Friday, October 10, 2003, at the offices of Preston Gates & Ellis
21 LLP ("Preston"), 925 Fourth Avenue, Suite 2900, Seattle, WA 98104. After inspection, the
22 undersigned and/or the other lead attorneys for the four Intervenor Groups will designate all or
23 portions of the documents to be copied, which copying will be arranged for promptly by Preston and
24 in any event no later than 9:00 a.m. on Monday, October 13, 2003. The cost of photocopying will be
25 billed to the four Intervenor Groups.
26

1 The four Intervenor Groups hereby confirm that each of them will comply with the
2 requirements of the Eighth Order: Protective Order in regard to the protection, copying, distribution
3 and use of any documents received pursuant to this Request.

4 DATED this ____ day of October, 2003.

5
6 SIRIANNI YOUTZ MEIER & SPOONEMORE

7
8 By _____
9 Richard Spoonemore
10 Attorneys for Intervenor Group Premera Watch
Coalition, acting on behalf of that Group and on
11 behalf, and with the authorization, of the three
other Intervenor Groups

12 **REQUEST FOR PRODUCTION**

13 **REQUEST FOR PRODUCTION NO. 1:**

14 Please produce the draft consultant reports and executive summaries submitted to Premera by
15 the OIC Staff.

16 **RESPONSE:**

17
18 RESPONSE DATED this ____ day of October, 2003.

19 PRESTON GATES & ELLIS LLP

20
21 By _____
22 Thomas E. Kelly, Jr., WSBA # 05690
23 Robert B. Mitchell, WSBA # 10874
24 Attorneys for Petitioner
PREMERA and Premera Blue Cross

1 ATTORNEY CERTIFICATION

2 The undersigned attorney for Premera has read the foregoing Document Request and
3 Premera's Response thereto, and hereby certifies that the Response is in compliance with the
4 requirements of CR 26(g).

5 DATED this _____ day of October, 2003.

6 PRESTON GATES & ELLIS LLP

7
8 By _____
9 Thomas E. Kelly, Jr., WSBA # 05690
10 Robert B. Mitchell, WSBA # 10874
11 Attorneys for Petitioner
12 PREMERA and Premera Blue Cross

13 VERIFICATION DECLARATION

14 I, _____, make the following declaration under penalty of perjury:

15 I am a representative of Premera and have been authorized by it to prepare this Verification
16 Declaration. I have read the foregoing Request for Production and Premera's Response thereto,
17 know the contents thereof, and state that the Response is true and correct.

18 I declare under penalty of perjury of the laws of the State of Washington that the foregoing is
19 true and correct.

20 Executed this ____ day of October, 2003, at _____, Washington.

21
22
23 _____
24 [Print name] _____
[Title] _____
25 Authorized Representative of Premera
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